

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

**In re:**

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**WW Contractors Inc.,**

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**Case No: 18-12095-BFK**

**Debtor.**

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**Chapter 11**

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**DEBTOR’S APPLICATION FOR AUTHORITY TO EMPLOY  
SAUL EWING ARNSTEIN & LEHR LLP AS SPECIAL LITIGATION COUNSEL**

WW Contractors Inc. (the “Debtor”) hereby files this *Application for Authority to Employ Saul Ewing Arnstein & Lehr LLP as Special Litigation Counsel* (the “Application”), and in support thereof states as follows:

**JURISDICTION AND VENUE**

1. The Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue lies properly in this Court pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157.

2. The relief sought pursuant to this application is based upon sections 327(a), 328, 330 and 1107 of 11 U.S.C. § 101, *et seq.* (the “Bankruptcy Code”).

**THE CHAPTER 11 CASE**

3. On June 12, 2018, the Debtor filed a voluntary petition for relief under Chapter 11 of the United States Code in the United States Bankruptcy Court for the District of Maryland, Case No. 18-17927. On June 14, 2018, the Bankruptcy Case was transferred to the United States Bankruptcy Court for the Eastern District of Virginia and was assigned Case No. 18-12095 (the “Bankruptcy Case”).

**THE RETENTION OF SAUL EWING ARNSTEIN  
& LEHR LLP AS SPECIAL LITIGATION COUNSEL TO THE DEBTOR**

4. Prior to the Petition Date, the Debtor commenced litigation against Sarai Investment Corporation and related parties (collectively, the “Defendants”) in the Circuit Court of Maryland for Baltimore City (the “Litigation”) in which the Debtor alleged numerous causes of action against the Defendants. The Litigation was subsequently removed to the United States District Court for the District of Maryland, case no. 1:18-cv-01341-CCB, where the Litigation is currently pending. Pursuant to this Application, the Debtor seeks authority to retain Saul Ewing Arnstein & Lehr LLP (“Saul Ewing”) to provide legal services in connection with the prosecution of the pending Litigation on the terms and conditions set forth herein.<sup>1</sup>

5. The Debtor selected Saul Ewing because of the firm’s experience, knowledge and familiarity with the issues presented in the Litigation. Toyja E. Kelley, a principal of Saul Ewing, regularly represents businesses such as the Debtor in complex commercial disputes and is well qualified to represent the Debtor in the Litigation. Saul Ewing will perform all legal services required by the Debtor in the Litigation and will be compensated on an hourly basis at the firm’s customary rates. Subject to the Court’s approval, Saul Ewing will charge the Debtor for its professional services based on the following rates:

Partners - \$360 - \$975  
Counsel - \$350-675  
Associates - \$250 - \$440  
Paralegals - \$90 - \$350

Such compensation will be paid from the estate only after approval of this Court on proper application therefore pursuant to 11 U.S.C. §§ 330 and 331.

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<sup>1</sup> Prior to the Petition Date, the Debtor had retained Christopher S. Young, Esquire and Heather K. Young of the Business & Technology Law Group (“BTLG”) to represent the Debtor in the Litigation. The Debtor has decided to terminate BTLG’s representation and wishes to retain Saul Ewing going forward.

6. To the best of the Debtor's knowledge, Saul Ewing has no connection with any creditor, the Debtor (other than this representation) or any other party in interest or their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee, except as set forth in the Verified Statement of Counsel to be Employed by Debtor, which is attached hereto and incorporated herein.

7. To the best of the Debtor's knowledge, Saul Ewing represents no interest adverse to the Debtor or the estate.

8. The Litigation represents a valuable asset of the Debtor's estate, and the Debtor believes that continued prosecution of the Litigation will be in the best interests of the Debtor, its creditors and the estate.

9. The Debtor submits that, pursuant to Local Bankruptcy Rule 9013-1, it will rely solely on the facts presented herein, and no memorandum of law will accompany this Application.

WHEREFORE, the Debtor respectfully requests that this Court enter an order pursuant to 11 U.S.C. § 327 approving the Debtor's employment of Saul Ewing Arnstein & Lehr LLP to represent it in the Litigation.

Dated: July 13, 2018

WW Contractors Inc.

BY: /s/ Warren Wiggins  
Warren Wiggins, President

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of July, 2018, a copy of the foregoing pleading was served electronically to those parties on the Court's CM/ECF notice list.

/s/ Aryeh E. Stein  
Aryeh E. Stein